Administration of Universal Service Support

72. Section 254(d) of the 1996 Act provides that the Commission may exempt carriers from contributing to the support of universal service if their contribution would be "de minimis." The conference report indicates that "[t]he conferees intend that this authority would only be used in cases where the administrative cost of collecting contributions from a carrier or carriers would exceed the contribution that carrier would otherwise have to make under the formula for contributions selected by the Commission." What levels of administrative costs should be expected per carrier under the various methods that have been proposed for funding (e.g., gross revenues, revenues net of payment to other carriers, retail revenues, etc.?

Provided that Sprint universal service support plan and the use of the BCM are adopted no such exemptions should be necessary. Sprint's proposal contemplates recovery through an explicit line charge on the enc user bills, administrative costs should be low enough that no exemptions are necessary. Additionally, in order to be truly competitively neutral, all consumers should be included regardless of the size of their provider.

Respectfully submitted,

SPRINT CORPORATION

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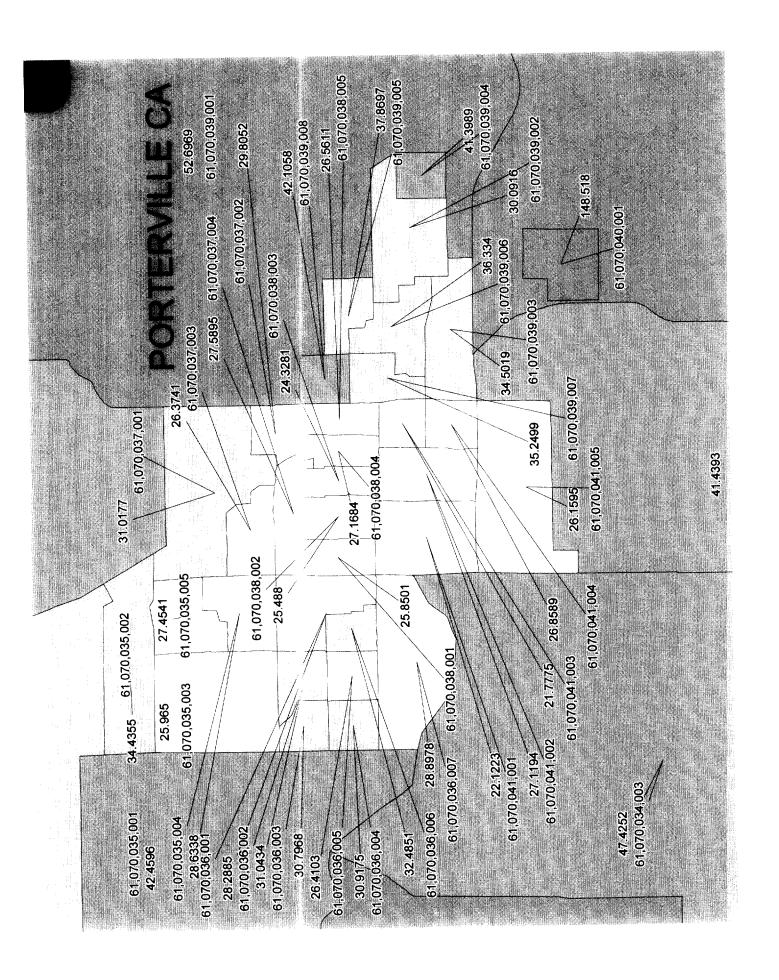
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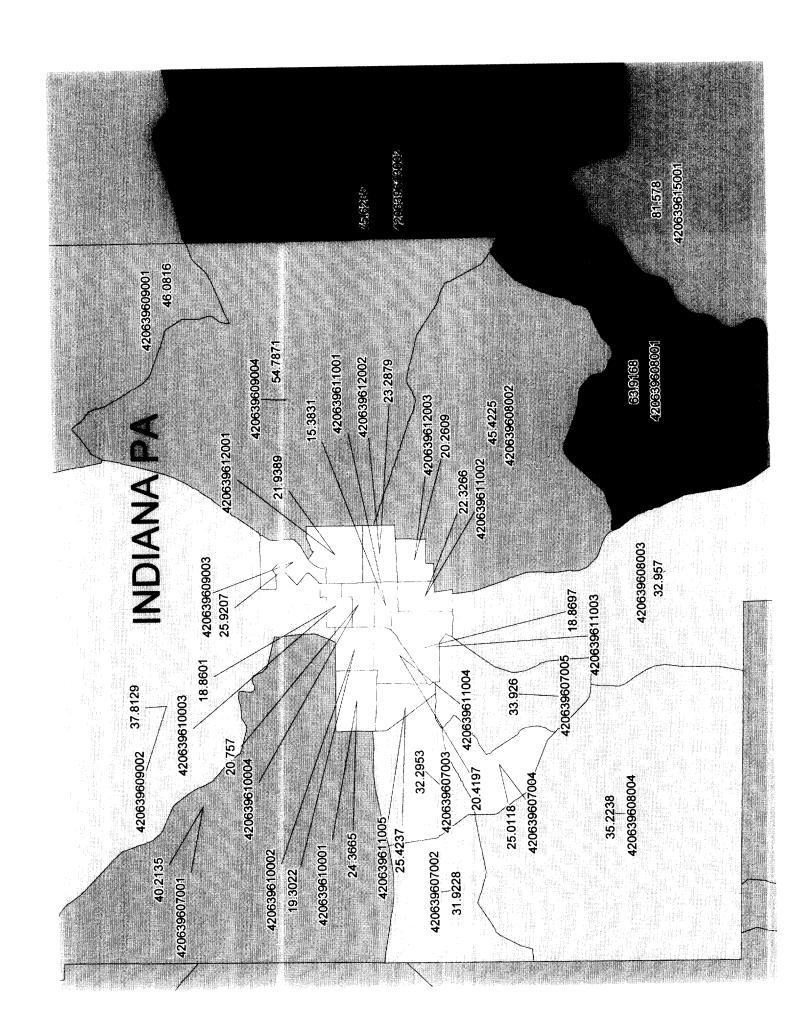
Its Attorneys

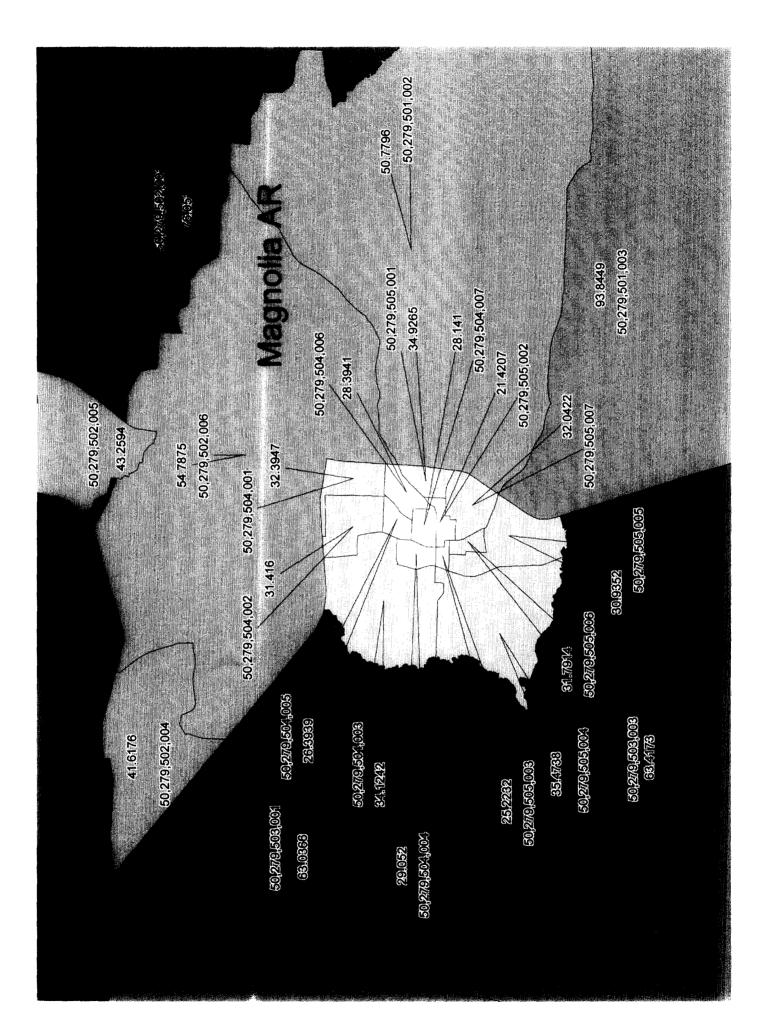
August 2, 1996



ATTACHMENT A







CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 2nd day of August, 1996, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments of Sprint Corporation on Specific Questions" in the Matter of Federal-State Joint Board on Universal Service, (C Docket No. 96-45, filed this date with the Acting Secretary, Federal Communications Commission, to the persons on the attached service list.

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